Message

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Sent: 4/14/2022 5:50:39 PM

To: Ting, Po-Chieh [Ting.PoChieh@epa.gov]; Su, Tina [Su.Tingzhi@epa.gov]

CC: Rios, Gerardo (he/him) [Rios.Gerardo@epa.gov]; Yannayon, Laura [Yannayon.Laura@epa.gov]

Subject: SJV - CVAQ Concerns Regarding ERC system

Attachments: CVAQ_3 requests re Valley ERCs_2.11.22.pdf; District Response Letter to CVAQ 3-25-22.pdf

Hi Tina and Po-Chieh,

Following our conversation regarding SJVAPCD oversight, I wanted to make you aware of an active Community Based Organization that has been very involved in looking into, and commenting on, the SJVAPCD's ERC system. CVAQ does not fully understand the ERC system but they are interested in learning about it. For example, at a few meetings they've asked the District do away with the ERC system, which is not something I think we can do as the offsets are required in nonattainment NSR and without credits its very difficult (impossible if the facility cannot lower emissions elsewhere) to issue permits.

We've had several discussions with CVAQ regarding the ERC system and we're working to address some of their concerns. Attached is a letter CVAQ wrote to the District earlier this year raising some of their concerns. Attached is also the SJVAPCD's response.

We can discuss this during our meeting later today if you'd like.

Best regards,

Mario Abraham Zúñiga (he/him/his) Air Permits Office (AIR-3-1) U.S. EPA, Region 9 (415)947-4282